

EXHIBIT 9

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

CHELSEA GILLIAM, et al.,)
Plaintiffs,)
vs.) CIVIL CASE NO.
DEPARTMENT OF PUBLIC SAFETY &) 1:23-cv-01047-MJM
CORRECTIONAL SERVICES, et al.,)
Defendants.)
_____) 1:28 p.m.

TUESDAY, NOVEMBER 21, 2023
Courtroom 5C
Baltimore, Maryland

TRANSCRIPT OF PROCEEDINGS
ZOOM TRO HEARING - VOLUME I
BEFORE THE HONORABLE MATTHEW J. MADDOX

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(Computer-aided Transcription of Stenotype Notes)

Reported by: Amanda L. Longmore, RPR, FCRR
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Direct Examination - Chloe Grey

1 Q. Okay. At this time I'd like to pull up an exhibit. I'm
2 not sure how to do that but we'd like to pull up Plaintiff's
3 Exhibit 1.

4 THE CLERK: Counsel, the share screen is on, so you
5 should be able to pull it up yourself.

6 MS. WEBER: I'm sorry, I don't think we realized we
7 needed to do it. Okay. I can keep going for now.

8 MS. DIMARTINO: I can add my computer and share from
9 here.

10 MS. WEBER: Okay. We're going to add another
11 computer to the Zoom so we can share the documents that way.

12 THE CLERK: Thank you.

13 MS. WEBER: Okay. I'll keep going and we'll come
14 back to the exhibit, then.

15 BY MS. WEBER:

16 Q. Ms. Grey, what was it like to be housed with men at WCI
17 after you began your transition?

18 A. It became increasingly terrifying. When I initially began
19 to transition, I was forced by the staff to out myself to my
20 entire housing unit of men, which immediately put me in an
21 impossible situation. I was ridiculed 24 hours a day. I was
22 constantly propositioned for sex. I was constantly pressured
23 and threatened for sex, and it became a struggle just to
24 survive day-to-day.

25 Q. At any point -- you talked about threats, I believe. Did

Direct Examination - Chloe Grey

1 any threats of sexual violence, in fact, become a reality?

2 A. Yes, ma'am. There were several incidents, one of the most
3 prominent of which WCI actually took it upon themselves to
4 place me on protective custody in administrative segregation
5 because male inmates had sent letters to me that were covered
6 in semen, that told me that I was going to be raped and killed
7 because I was a transgender female that wanted to wear bras and
8 panties.

9 Q. And so you mentioned after that you were moved to
10 administrative segregation at WCI; is that right?

11 A. Yes, ma'am.

12 Q. And how long were you kept in administrative segregation
13 at WCI?

14 A. I was on administrative segregation for a little over a
15 month, I believe.

16 Q. And what led you to leaving administrative segregation at
17 WCI?

18 A. Absolute terror and self-preservation. I personally know
19 trans women that have been murdered in segregation at WCI and
20 recently with that time, and segregation is used for
21 retaliation against people as myself that file PREA complaints.
22 It's an extremely dangerous environment, especially for a
23 transgender woman.

24 Q. And when you left administrative segregation, was that
25 your choice to do so or did WCI --

Direct Examination - Chloe Grey

1 (Technical difficulty.)

2 MS. WEBER: Sorry. We have to mute both computers.
3 Apologies. Let me repeat that.

4 BY MS. WEBER:

5 Q. When you finally left administrative segregation at WCI,
6 was that your choice, was that the institution's choice? How
7 did that come about?

8 A. I was approached by a Lieutenant Forney at WCI who came
9 and told me that I had two choices. I could either remain in
10 administrative segregation indefinitely, or I could sign what
11 they referred to as a body waiver, meaning I will take
12 responsibility for my own safety and return to general
13 population. I signed that body waiver to escape the absolute
14 terror and mental health problems that I developed from being
15 in solitary confinement, and I took my chances in general
16 population rather than to suffer in solitary confinement.

17 Q. Once you were transferred back to general population, did
18 you continue to experience any threats or actual sexual
19 violence upon your return?

20 A. Yes, ma'am. I immediately was placed in the cell with a
21 290-pound convicted sex offender who immediately physically
22 assaulted me and attempted to rape me within less than 20
23 minutes of being in the cell.

24 The only thing that saved me was that an officer happened
25 to walk by conducting counts and realized that there was a

Direct Examination - Chloe Grey

1 physical fight occurring in that cell, at which time they
2 simply removed me from the cell and put me on a tier right next
3 to that tier I was assaulted on and didn't take any
4 disciplinary action or security action against my rapist.

5 Q. And then you mentioned that you were transferred to
6 Patuxent in 2023. Do you know why you were transferred to
7 Patuxent?

8 A. I was transferred to Patuxent in 2023 because I had
9 applied to and was accepted for the Georgetown bachelor's of
10 liberal arts program at Patuxent.

11 Q. We'll talk about that in a minute. When you were
12 transferred to Patuxent, did you tell anybody you wanted to be
13 housed with women?

14 A. When I got to Patuxent, I had actually been led to believe
15 there was a strong possibility I would have been housed at PIW.
16 When I got there I was immediately informed that inmates such
17 as myself were housed with men, and I immediately became
18 concerned about whom they were going to try to put me in the
19 cell with for my own physical and sexual safety. They told me
20 that they were going to put me in a cell with a male inmate of
21 their choosing, and I immediately requested that if that was
22 going to be the way they were going to conduct things, that I
23 was requesting to be housed by myself for my safety.

24 Q. And you mentioned PIW. Is that Patuxent Institution for
25 women?